

# CLARK SMITH VILLAZOR

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February 16, 2024

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)  
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend a birthday party and dinner for his daughter at local venues on February 29, 2024 and for his second daughter at other local venues on March 4, 2024. The time and location of each party and dinner shall be disclosed to and approved by Pretrial Services not less than 72 hours in advance of each event. Mr. Goettsche will be accompanied by a third-party custodian at each event.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkt. 187, 193, 225, 229, 251, 257, 270, 281, 290, 305 and 310). The Court previously denied a motion to modify bail conditions (dkt. 268). The aforementioned proposed modification would not otherwise modify any other conditions as previously set forth or modified by this Court.

Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
CLARK SMITH VILLAZOR LLP

Hon. Michael A. Hammer

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